



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD, 6TH FLOOR
CHICAGO, IL 60604

MEMORANDUM

DATE: 17 May 2021

SUBJECT: Review of Quality Assurance Project Plan Addendum for Area 9/10 Southeast Rockford Groundwater Contamination Superfund Site

FROM: Kelly Rodibaugh
Physical Scientist, Laboratory Services and Applied Sciences Division

TO: Jennifer Knoepfle
Remedial Project Manager, Superfund and Emergency Management Division

The purpose of this memo is to document our review of the subject quality assurance project plan (QAPP), dated February 2021 for the Area 9/10 Southeast Rockford Groundwater Contamination Superfund Site, prepared by AECOM. The Quality Assurance Project Plan (QAPP) *is returned with comments and resubmission is requested*. Please send a revised QAPP to my attention and load any response documents into the SQAB database under ticket #458.

General

The original QAPP for remedial action (RA) is from 2008 and the last addendum from 2014. In addition to addressing the comments below, the QAPP needs to be resubmitted and revised as a complete document (all worksheets and associated content, all field and lab SOPs, in UFP-QAPP format¹) rather than an addendum. This follows regional and divisional policy and procedures.

QAPP Worksheet #3 & #5: Project Organization and QAPP Distribution

- Update to the current EPA RPM and QA reviewer. (Also, Section 2.1, 2.7.)
- Org Chart – define what the solid line represents and what the broken line represents.

QAPP Worksheet #14 & #16: Project Tasks and Schedule

- Add clarification that 1,4-Dioxane will be collected at all monitoring stations with the same frequency as established monitoring. If this is not accurate, describe the monitoring plan for 1,4-Dioxane.

QAPP Worksheet #15: Project Action Limits and Laboratory-Specific Detection/Quantitation Limits (Appendix C)

- The project specific reporting limit for 1,4-Dioxane on p. 9 is 0.4 ug/L. The lab SOP lists their RL as 130 ug/L for water matrix samples. This needs to be reconciled. What are the project specific

¹ Guidance available at: <https://www.epa.gov/fedfac/assuring-quality-federal-cleanups>

measurement objectives for this analyte and can this lab meet them? Screening/action levels must be documented for 1,4-dioxane. The former is normally 0.46 µg/L².

- There are 2 tables on p. 9. No method is listed for the volatiles. Add this information. The method is assumed to be 8260D.

QAPP Worksheet #23: Analytical SOPs

- Provide accreditation records for the 8260D method and analytes.

>End Comments<

Please feel free to contact me at (312) 886-2935 with any questions or to discuss the information above so the subject planning document can be completed.

cc: Tim Prendiville, SQAB/LSASD
Michelle Kerr, SQAB/LSASD

² Regional Tap Water Screening Levels <https://semspub.epa.gov/work/HQ/200055.pdf>